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ADMITTED TO NY, NJ & CA BARS

# MEMO ENDORSED

August 16, 2023

## VIA ECF

Hon. Lewis A. Kaplan  
United States District Judge  
Southern District of New York  
500 Pearl Street  
Courtroom Room 21B  
New York, NY 10007

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|-----------------------|
| USDS SDNY             |
| DOCUMENT              |
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Granted.  
SO ORDERED.  
/s/ Lewis A. Kaplan  
Lewis A. Kaplan  
United States District Court Judge  
Dated: August 21, 2023

Re: *United States v. Jose Alfredo Aguas Oviedo,*  
Criminal Docket No.: 21-Cr-359 (LAK)

Dear Judge Kaplan:

I represent Jose Alfredo Aguas Oviedo, (“Mr. Oviedo”) in the above matter. I write to respectfully request the Court’s permission to file certain portions of Mr. Oviedo’s pretrial motions under seal.

In its Rule 16 materials, the government inadvertently disclosed to defense counsel a document revealing the identity of a confidential source involved in its investigation of this matter. A portion of Mr. Oviedo’s pre-trial motions rely upon information learned through the government’s disclosure.

Out of an abundance of caution, I have redacted from the ECF-filed version of Mr. Oviedo’s motions any information that could potentially reveal the identity of the government’s confidential source.<sup>1</sup> This includes information contained in Mr. Oviedo’s memorandum of law in support (Dkt. No. 70), undersigned counsel’s declaration (Dkt. No. 71), and Exhibits C, D, E and F thereto.

Other minor redactions include the Cedula<sup>2</sup> numbers of individuals referred to in the motion papers; the identity of one of the proposed Rule 15 deponents; and certain personal information pertaining to Mr. Oviedo.<sup>3</sup>

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<sup>1</sup> The information was contained in publicly filed documents available on PACER.

<sup>2</sup> An individual’s Cedula number is a national identification number unique to each person. It is comparable to a social security number.

<sup>3</sup> If the Court requires further information regarding the sealing of this information, I respectfully request the Court’s permission to set forth the reasons in a sealed filing.